

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**REVISED RESPONSES OF POSTAL SERVICE WITNESS MARTIN TO  
NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES  
(NPMHU/USPS-T6-5, 15 AND 24) [ERRATA]**

The Postal Service hereby gives notice of the filing of errata to Postal Service Witness Martin's February 2, 2012, responses to National Postal Mail Handlers Union Interrogatories (NPMHU/USPS-T6-5, 15 and 24). The attached, revised responses supersede the responses filed on February 2, 2012.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

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May 4, 2012

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

**NPMHU/USPS-T6-5.** For each plant-to-plant surface transportation trip that will form part of the MNPR Network, please identify the trip and provide the same categories of information for that trip as are provided for the trips listed in the spreadsheet "Plant to Plant Trips," LR-N2012-1/11. Please provide the USPS' best estimate of the "Trip Miles" and "Utilization" for each such trip.

**RESPONSE:**

The responsive information is contained in the spreadsheet labeled "Plant-to-Plant Update Rev (4.30.12).xls" in library reference USPS-LR-N2012-1/77. Each trip that has not been identified as a candidate for elimination is intended to be included in the rationalized network.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

**NPMHU/USPS-T6-15.** Referring to Library Exhibit N2012-1/11, please update the sheet showing plant-to-plant routes with the planned routes and estimated utilization percentages under the MNPR, assuming all pending AMP studies are approved.

**RESPONSE:**

The responsive information is contained in the spreadsheet labeled "Plant-to-Plant Update Rev (4.30.12).xls" in library reference USPS-LR-N2012-1/77. Trips that share the same HCR identification number are a part of the same route. The information in the spreadsheet is based on the results of all AMP studies that were announced on February 23, 2012, and that were approved by the Postal Service.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

**NPMHU/USPS-T6-24.** In response to PR/USPS-T6-12, you stated that you will update your testimony in this docket “[w]hen all of the AMP studies relevant to this docket have been completed.” Please update your testimony, including by providing updated estimates of costs savings and updated estimates of reductions or increases in operating miles, with all of the AMP studies completed as of February 15, 2012.

**RESPONSE:**

Please see USPS-ST-2, page 4, lines 17 through 23, and page 5, lines 1 through 10, and the spreadsheet labeled “Plant to Post Office Update (4.16.12).xls” contained in library reference USPS-LR-N2012-1/77. Estimating the cost savings resulting from reductions in operating miles is outside the scope of my testimony.